

Marcus A. Helt (TX 24052187)  
[mhelt@gardere.com](mailto:mhelt@gardere.com)  
Thomas C. Scannell (TX 24070559)  
[tscannell@gardere.com](mailto:tscannell@gardere.com)  
GARDERE WYNNE SEWELL LLP  
1601 Elm Street, Suite 3000  
Dallas, Texas 75201-4761  
Telephone: 214.999.3000  
Facsimile: 214.999.4667

COUNSEL FOR OPEN-SILICON, INC.

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

IN RE:	§	
	§	CASE NO. 15-10109-HCM
COINTERRA, INC.,	§	
	§	CHAPTER 7
DEBTOR.	§	
	§	

**MOTION TO CONTINUE HEARING**  
**[Doc. No. 84]**

Open-Silicon, Inc. (“*OSI*”), creditor and party-in-interest in the above-captioned chapter 7 case, by and through its undersigned counsel, hereby files this *Motion to Continue Hearing* (the “*Motion to Continue*”) on the *Application of Open-Silicon, Inc. for Administrative Expense Claim* [Docket No. 84] (the “*Application*”). In support of the Motion to Continue, Movant respectfully states as follows:

1. On January 24, 2015 (“*Petition Date*”), Cointerra, Inc. (“*Cointerra*”) filed its Voluntary Petition for relief under Chapter 7 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “*Bankruptcy Code*”), commencing this bankruptcy case.
2. Randolph N. Osherow is the duly appointed Chapter 7 Trustee (“*Trustee*”) in this case.
3. On April 19, 2016, OSI filed the Application.

4. On May 25, 2016, the Trustee filed his *Response of Randolph N. Osherow, Trustee, to Application of Open-Silicon, Inc., for Administrative Expense Claim* [Docket No. 92].

5. A hearing on the Application (the “**Hearing**”) is set for June 23, 2016, at 10:00 a.m.

6. OSI’s Texas counsel will be on vacation during the week of June 20, 2016, and Trustee’s counsel has experienced a health issue and would appreciate a continuance of the Hearing to a later date.

7. So OSI respectfully requests that this Court continue the Hearing

WHEREFORE, Movant respectfully requests that the Court enter an order (a) granting this Motion, (b) continuing the hearing on the Application for Administrative Claims to a date after June 27, 2016, that is convenient for the Court, OSI, and chapter 7 trustee, and (c) granting the Movant such other and further relief that this Court deems just and proper.

Dated: June 16, 2016

Respectfully submitted,

**GARDERE WYNNE SEWELL LLP**

By: /s/ Marcus A. Helt

Marcus A. Helt (TX 24052187)

Thomas Scannell (TX 24070559)

1601 Elm Street, Suite 3000

Dallas, Texas 75201-4761

Telephone: 214.999.3000

Facsimile: 214.999.4667

[mhelt@gardere.com](mailto:mhelt@gardere.com)

[tscannell@gardere.com](mailto:tscannell@gardere.com)

**ATTORNEYS FOR OPEN-SILICON,  
INC.**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on June 16, 2016, a true and correct copy of the foregoing document was served on all parties registered for electronic notice via the Court's CM/ECF service.

/s/ Marcus Helt

Marcus Helt

**CERTIFICATE OF CONFERENCE**

On June 16, 2016, I spoke with Trustee's counsel, and he not only consents to the requested relief, but because of a medical condition, he joins in the requested relief.

/s/ Marcus Helt

Marcus Helt